

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

In Re:

Kyle Cloven
Courtney Cloven
Debtor.

Chapter 13
Case No. 19-46461-mlo
Hon. Maria L. Oxholm

PROPOSED POST-CONFIRMATION PLAN MODIFICATION

The Debtor's, Kyle & Courtney Cloven, has filed papers with the Court to modify her Chapter 13 Plan which was confirmed on June 9, 2020 [docket #69]. A proposed order granting the Plan Modification is attached as **Exhibit A**.

The Debtor proposes to modify the confirmed Plan pursuant to LBR 3015-2(b) as follows:

1. The Debtor's are excused from remitting \$2,809.09 from their 2021 Income Tax Refund.
2. The Debtor's used these funds to repair both of their vehicles.
3. The Debtor's have remitted the difference to the Trustee.
4. The impact on each class of creditors of this Plan Modification is as follows:
 - a. Class 2 and Class 4 creditors will have no impact.
 - b. Class 3 creditors will have no impact.
 - c. Class 5 creditors will have no impact.
 - d. Class 6 creditors will have no impact.
 - e. Class 7 creditors will have no impact.
 - f. Class 8 creditors will have no impact.
 - g. Class 9 creditors will have no impact.

In all other respects, the Order Confirming Plan referred to above shall remain in full force and effect.

Attached hereto collectively as **Exhibit B** are a Liquidation Analysis, Worksheet, and a Plan Calculation.

Respectfully submitted,

MAXWELL DUNN LAW

/s/ Ethan Dunn
Ethan Dunn (P69665)
Attorney for Debtor
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Dated: July 13, 2022

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EASTERN DISTRICT OF MICHIGAN
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ORDER MODIFYING CHAPTER 13 PLAN

The Debtor's, Kyle & Courtney Cloven, having filed a Post-Confirmation Plan Modification on June 30, 2022, and served same on the mailing matrix and the Chapter 13 Trustee; no responses or objections having been timely filed with this Court, or any objections having been resolved, and this Court being otherwise sufficiently advised in the premises;

IT IS ORDERED THAT:

1. The Debtor's Plan Modification is approved.
2. The Debtor's are excused from remitting \$2,809.09 from their 2021 Income Tax Refund for vehicle repairs.
3. In all other respects, Debtor's Chapter 13 Plan, as last amended, shall remain unchanged.

PROPOSED ORDER

Exhibit A

**UNITED STATES BANKRUPTCY COURT
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**NOTICE OF DEADLINE TO OBJECT TO PROPOSED
CHAPTER 13 PLAN MODIFICATION**

The deadline to file an objection to the attached proposed Chapter 13 Plan Modification is twenty-one (21) days after service.

If no timely responses are filed to a proposed post-confirmation Plan Modification, the proponent may file a certificate of no response and request entry of an order approving the Plan Modification.

If a timely objection is filed, the Court will set the matter for hearing and give notice of the hearing to the Debtor, the proponent of the Plan Modification, the Trustee and any objecting parties. In that event, the plan modification will become effective when the Court enters an order overruling or resolving all objections.

Objections to the attached proposed Chapter 13 Plan modification shall be served on the following:

Ethan Dunn
Attorney for Debtors
Maxwell Dunn Law
24725 W. 12 Mile Road, Suite 306
Southfield, MI 48034

Tammy L. Terry
Standing Chapter 13 Trustee
535 Griswold, Suite 111-615
Detroit, MI 48226

Respectfully submitted,

MAXWELL DUNN LAW

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Dated: July 13, 2022